

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,
on behalf of herself and others similarly situated,

Case No. 21 Civ. 8469

Plaintiff,
-against-

DARREN K. INDYKE and RICHARD D. KAHN,
as EXECUTORS OF THE ESTATE OF JEFFREY E.
EPSTEIN, and LESLEY GROFF,

Defendants.

x

NOTICE OF MOTION FOR LEAVE TO PROCEED ANONYMOUSLY

PLEASE TAKE NOTICE that on such date and time as counsel may be heard, Plaintiff, by and through her undersigned attorneys, shall move before the Honorable P. Kevin Castel for an order granting Plaintiff leave to proceed anonymously in this action using the pseudonym “Jane Doe” instead of her real name.

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that Defendant Lesley Groff consents to the relief requested in this motion. Counsel for Defendants Indyke and Kahn has indicated that they take no position on this motion at this time and that they will determine their position after the motion is filed.

Dated: New York, New York
October 28, 2021

CUTI HECKER WANG LLP

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